UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

REGION 32

In the Matter of)	
SOUTHERN MONTEREY COUNTY MEMORIAL HOSPITAL, INC. D/B/A GEORGE L. MEE MEMORIAL HOSPITAL,)) Case)	32-RC-090886
Employer,)	
and)	
NATIONAL UNION OF HEALTHCARE WORKERS,)))	
Petitioner.)	
)	

DECLARATION OF MICHAEL R. GOLDSTEIN IN SUPPORT OF EMPLOYER GEORGE L. MEE MEMORIAL HOSPITAL'S BRIEF IN OPPOSITION TO THE UNION'S EXCEPTIONS TO THE HEARING OFFICER'S REPORT AND RECOMMENDATIONS ON CHALLENGED BALLOT

- I, Michael R. Goldstein, declare as follows:
- 1. I am an attorney and partner in the Law Offices of Musick, Peeler & Garrett LLP, counsel for the Employer George L. Mee Memorial Hospital ("the Hospital") in this matter. I have personal knowledge of the facts asserted in this Declaration and if called to testify I could and would competently testify thereto.

- As of the date of this Declaration, I have not received the Exceptions or any of the accompanying documents from the Petitioner National Union of Healthcare Workers ("Union") by any method whatsoever. There has been no service by facsimile, U.S. mail or email by the Union. I only received copies of the Exceptions and accompanying documents from my colleague, Robert M. Stone, who had received them from Region 32.
- 3. To this date, I have not received any communications from the Union concerning the substance of its Exceptions or any accompanying documents. Further, I have not been asked for consent nor consented to service via facsimile.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 20, 2013, at Los Angeles, California.

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PROOF OF SERVICE

STA	TE	OF ·	CAL	JFORNIA	. COUNTY	OF	LOS	ANGELES
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At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is One Wilshire Boulevard, Suite 2000, Los Angeles, California 90017-3383.

On February 20, 2013, I served true copies of the following document(s) described as DECLARATION OF MICHAEL R. GOLDSTEIN IN SUPPORT OF EMPLOYER GEORGE L. MEE MEMORIAL HOSPITAL'S BRIEF IN OPPOSITION TO THE UNION'S EXCEPTIONS TO THE HEARING OFFICER'S REPORT AND RECOMMENDATIONS ON CHALLENGED BALLOT on the interested parties in this action as follows:

- BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Musick, Peeler & Garrett LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- BY FAX TRANSMISSION: I faxed a copy of the document(s) to the persons at the fax numbers listed in the Service List. The telephone number of the sending facsimile machine was 213-624-1376. No error was reported by the fax machine that I used.
- BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address p.bell@mpglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 20, 2013, at Los Angeles, California.

Georgina L. Camacho

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MUSICK, PEELER & GARRETT LLP

ATTORNEYS AT LAW

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